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Mr. Andrew Fanara
Office of Air and Radiation
United States Environmental Protection Agency
Washington, DC 20460

Dear Mr. Fanara,

The Consumer Electronics Association (CEA) is the preeminent trade association promoting growth in the \$161 billion U.S. consumer electronics industry through technology policy, standards, events, research, promotion and the fostering of business and strategic relationships. CEA represents more than 2,200 corporate members. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute consumer electronics that use external power supplies (EPSs). Such products include, but are not limited to, camcorders, computer monitors, cordless phones, digital cameras, laptop and notebook computers, mobile phones, personal digital assistants, printers, scanners, and two-way radios. CEA and its members have been very active in regulatory policy relevant to EPSs at the state, federal and international levels.

On March 6, 2008, the EPA released the Revised Final Draft Version 2.0 of the ENERGY STAR External Power Supply (EPS) specification. This document outlines the proposed new energy efficiency requirements that EPS models would need to meet in order to earn the ENERGY STAR logo. This document is intended to replace the current Version 1.1 specification. On November 20, 2007 and again on February 1, 2008, we wrote to express our concerns and general comments with respect to Draft 1. We are submitting these comments for further consideration after reviewing the Revised Final Draft.

Effective Date

While we have previously urged the EPA to consider the value and utility of a revision to the EPS specification in light of recent state and federal action, the effective date of any revised specification must be carefully considered. Currently, the EPA is proposing that the ENERGY STAR EPS Version 2.0 specification take effect on November 1, 2008.

In light of the ongoing efforts by industry stakeholders to meet new federal energy efficiency standards for this product category, CEA believes that the ENERGY STAR EPS Version 2.0 requirements should be made effective no earlier than eighteen months after final publication of the specification. Please note that this proposed effective date represents a substantial

change from the effective date previously proposed by CEA and attempts to balance the EPA's deadlines with industry and marketplace realities. Of particular concern and relevance to timelines is the fact that EPA has made the ENERGY STAR criteria for low-wattage supplies, especially those of less than 10 watts, more stringent in the Revised Final Draft as compared to Draft 1. CEA's proposed effective date will substantially improve manufacturers' ability to meet market demands with compliant products immediately upon the effective date. This is a desirable outcome for manufacturers, the ENERGY STAR program, and consumers alike.

Additionally, the EPA proposes that "to qualify as ENERGY STAR, primarily portable products with EPSs that are not otherwise covered by the ENERGY STAR program (e.g., mobile phones, MP3 speaker systems, water filtration systems) must meet the EPS Version 2.0 specification as of July 1, 2008." While we understand the EPA's desire to have an Energy Star specification that is more stringent than federally mandated rules set to become effective on July 1, it is unreasonable to expect that primarily portable products will be able to incorporate ENERGY STAR Version 2.0 compliant EPSs several months before the effective date of the Version 2.0 specification. Compliant EPSs are unlikely to be available in sufficient quantity, and from multiple vendors much in advance of the effective date of the Version 2.0 specifications. Accordingly, this provision should be harmonized with the effective date of Version 2.0 of the specification.

Low-Wattage Supplies

As we have mentioned in past correspondence, many consumer electronics products rely on low-wattage power supplies. The requirements proposed in the Revised Final Draft are significantly more stringent than existing specifications and regulations, and products relying on low-wattage supplies will find compliance with the proposed criteria extremely difficult. According to the EPA, approximately 27.4% of all available EPSs meet the Active Mode and No-Load requirements specified in the Revised Final Draft. Low-wattage power supplies, which comprise a minority of the data set referenced by the EPA, that are made compliant with the revised ENERGY STAR specifications would carry a cost penalty that is significant when compared to the savings that can be attributed to the proposed increase in efficiency for low-wattage supplies. In our February letter we provided examples that show savings ranging from less than one cent to perhaps twenty cents a year based on typical usage. For low-wattage power supplies, a cost benefit analysis suggests a cost penalty rather than a cost benefit. Thus, it would not make economic or business sense to market low-wattage power supplies that meet the revised ENERGY STAR specification under the EPA's currently proposed effective date. Consequently, unless the effective date is changed to allow the marketplace to adjust over a more reasonable timeframe, many manufacturers may be forced to drop out of the ENERGY STAR program.

We appreciate the opportunity to comment on the Revised Final Draft ENERGY STAR EPS Version 2.0 specification. We look forward to continued close cooperation. Please do not hesitate to contact us if you have any questions.

Sincerely,

/s/

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Douglas Johnson
Senior Director, Technology Policy & International Affairs

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Senior Director, Technology & Standards

cc: Kathleen Hogan
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